

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS.

JALBERT LEASING, INC.
d/b/a C&J Trailways
185 Grafton Drive
Portsmouth, New Hampshire 03801

BONANZA ACQUISITION, LLC
One Bonanza Way
Providence, Rhode Island 02940

CONCORD COACH LINES, INC.
d/b/a Concord Trailways
South Main Street
Concord, New Hampshire 03301

DARTMOUTH TRANSPORTATION
COMPANY, INC.
d/b/a Dartmouth Coach
7 Langon Street
Concord, New Hampshire 03301

Plaintiffs,

v.

MASSACHUSETTS PORT AUTHORITY
One Harborside Drive, Suite 200S
East Boston, Massachusetts 02128

Defendants.

FILED 03/29/04 PM 3:27

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. No. 04-10486 (RCL)

JOINT MOTION TO ENLARGE TIME

Pursuant to Fed. R. Civ. P. 7(b), the parties jointly move to defer the filing of an Answer in this Action until 10 days after the Court's decision on contemplated cross-motions for summary judgment, should any part of the case survive such motions. In light of the fact that Plaintiffs contemplate filing a motion for summary judgment upon expiration of the 20 day

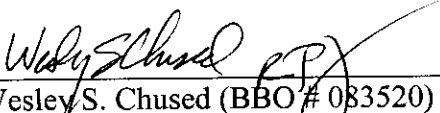
period referenced in Fed. R. Civ. P. 56 and the defendant expects to file a cross-motion, the parties request that the Court set the following briefing schedule:

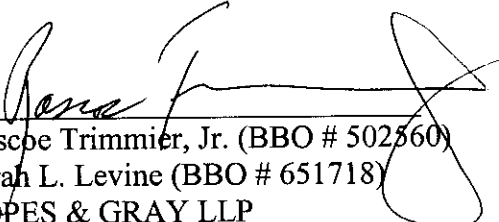
Plaintiffs' Motion for Summary Judgment	On or about April 1, 2004
Defendant's Opposition to Motion for Summary Judgment and Cross-Motion for Summary Judgment	30 days after Motion filed
Plaintiffs' Opposition to Cross-Motion	20 days after Cross-Motion filed

Respectfully submitted,

FOR THE PLAINTIFFS,

FOR THE DEFENDANTS,


Wesley S. Chused (BBO # 083520)
LOONEY & GROSSMAN LLP
101 Arch Street
Boston, MA 02110
(617) 951-2800


Roscoe Trimmer, Jr. (BBO # 502560)
Sarah L. Levine (BBO # 651718)
ROPES & GRAY LLP
One International Place
Boston, MA 02110
(617) 951-7000

Jeremy Kahn
KAHN & KAHN
1730 Rhode Island Ave., N.W.
Suite 810
Washington, D.C. 20036
(202) 887-0037



ROPES & GRAY LLP
ONE INTERNATIONAL PLACE BOSTON, MA 02110-2624 617-951-7000 F-617-951-7050
BOSTON NEW YORK SAN FRANCISCO WASHINGTON, DC

March 29, 2004

Sarah L. Levine
(617) 951-7703
slevine@ropesgray.com

BY HAND

Clerk's Office
U.S. District Court
for the District of Massachusetts
1 Courthouse Way
Boston, MA 02210

Re: *Jalbert Leasing, Inc., Bonanza Acquisition, LLC, Concord Coach Lines, Inc.,
Dartmouth Transportation Company, Inc. v. Massachusetts Port Authority*
CA No. 04-10486 (RCL)

Dear Sir or Madam:

Enclosed for filing please find Defendant's Joint Motion To Enlarge Time. Please date stamp the enclosed copy of this letter and return it to the messenger.

Thank you for your attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to be "SL", written over a horizontal line.

Sarah L. Levine

SLL:kjc
Enclosures

cc: Wesley S. Chused, Esq.
Jeremy Kahn, Esq.
Roscoe Trimmier, Jr., Esq.